

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
MIDLAND/ODESSA DIVISION**

REDSTONE LOGICS LLC

Plaintiff,

v.

APPLE INC.,

Defendant.

Case No. 7:25-cv-00183-ADA

JURY TRIAL DEMANDED

FIRST AMENDED COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Redstone Logics LLC (“Redstone”) files this first amended complaint against Defendant Apple, Inc. (collectively, “Defendant” or “Apple”) alleging infringement of U.S. Patent No. 8,549,339 (the “’339 Patent” or the “Patent-in-Suit”).

The Parties

1. Plaintiff Redstone Logics LLC is a limited liability company organized under the laws of the State of Texas, with an address at 2150 S. Central Expressway, Suite 200, McKinney, TX 75070.
2. On information and belief, Defendant Apple Inc. is a publicly traded corporation organized under the laws of the State of California, with its principal place of business at One Apple Park Way, Cupertino, CA 95014. Defendant may be served with process through its registered agent, C T Corporation System 1999 Bryan St., Suite 900, Dallas, TX 75201.

Jurisdiction and Venue

3. This action arises under the patent laws of the United States, Title 35 of the United States Code. This Court has original subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

4. This Court has personal jurisdiction over Defendant in this action because Defendant has established minimum contacts with the United States as a whole, such that the exercise of jurisdiction would not offend traditional notions of fair play and substantial justice. Defendant has purposefully directed activities at the United States, in particular, directing Accused Products for sale to customers and distributors within the United States (including within this District) and engaging in sales and marketing efforts to generate and support such sales. Defendant has committed and continues to commit acts of infringement in this District by, among other things, importing, offering to sell, and selling products that infringe the Asserted Patent. Defendant, directly and through subsidiaries, intermediaries, and third parties, has committed and continues to commit acts of infringement in this District by, among other things, making, using, offering to sell, selling, and importing products that infringe the Asserted Patent.

5. Venue is proper in this District under 28 U.S.C. §§ 1391 and 1400(b). Upon information and belief, Defendant has transacted business in this District and has committed acts of direct and indirect infringement in this District by, among other things, making, using, offering to sell, selling, and importing products that infringe the Asserted Patents. Defendant has regular and established places of business in this District, including at 12545 Riata Vista Cir., Austin, Texas 78727 and 12801 Delcour Dr. Austin, Texas 78727.

Count 1
Infringement of U.S. Patent No. 8,549,339

6. Redstone incorporates by reference each of the allegations in the preceding paragraphs and further alleges as follows:

7. Redstone is the owner of U.S. Patent No. 8,549,339 entitled “Processor core communication in multi-core processor,” which issued on October 1, 2013. A copy of the ’339 Patent is attached to this complaint as **Exhibit 1**.

8. On information and belief, Defendant makes, uses, offers for sale, sells, and/or imports certain products (“Accused Instrumentalities”), including products comprising one or more SoC each comprising two or more sets of processors implementing the Firestorm and Icestorm architecture (or similar architecture), including without limitation the Apple M series System on Chip and the Apple A series System on Chip, that directly infringe, literally and/or under the doctrine of equivalents, one or more claims of the ’339 Patent.

9.

10. The Accused Instrumentalities satisfy all claim limitations of one or more claims of the ’339 Patent. A claim chart comparing independent claim 1 of the ’339 Patent to representative Accused Instrumentalities is attached as **Exhibit 2** and incorporated by reference herein.

11. By making, using, offering for sale, selling and/or importing into the United States the Accused Instrumentalities, Defendant has injured Plaintiff and is liable for infringement of the ’339 Patent pursuant to 35 U.S.C. § 271.

12. As a result of Defendant’s infringement of the ’339 Patent, Plaintiff is entitled to monetary damages in an amount adequate to compensate for Defendant’s infringement, but in no event less than a reasonable royalty for the use made of the invention by Defendant, together with interest and costs as fixed by the Court.

Jury Trial Demanded

13. Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Redstone requests a trial by jury of any issues so triable by right.

Prayer for Relief

Plaintiff Redstone respectfully requests the following relief from this Court:

- A. A judgment in favor of Redstone that Defendant has infringed the '339 Patent, and that the '339 Patent is valid, enforceable, and patent-eligible;
- B. A judgment and order requiring Defendant to pay Redstone compensatory damages, costs, expenses, and pre- and post-judgment interest for its infringement of the asserted patent, as provided under 35 U.S.C. § 284;
- C. Any and all injunctive and/or equitable relief to which Redstone may be entitled including, but not limited to, ongoing royalties with respect to Defendant's infringement of the '339 Patent;
- D. A judgment and order requiring Defendant to provide an accounting and to pay supplemental damages to Redstone, including, without limitation, pre-judgment and post-judgment interest;
- E. A finding that this case is exceptional under 35 U.S.C. § 285, and an award of Redstone's reasonable attorney's fees and costs; and
- F. Any and all other relief to which Redstone may be entitled.

Dated: July 14, 2025

/s/ Reza Mirzaie

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